

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JACOB ATKINSON, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

BURBERRY LIMITED, a foreign for profit
corporation doing business as BURBERRY;
and DOES 1 through 20,

Defendant.

Case No. 2:23-cv-01736-BJR

**STIPULATED MOTION FOR
EXTENSION OF TIME TO ANSWER
OR RESPOND TO COMPLAINT AND
DISCOVERY DEADLINES AND ORDER**

Plaintiff Jacob Atkinson and Defendant Burberry Limited (“Burberry”) respectfully, ask pursuant to Local Civil Rule 10(g), Local Civil Rule 7(d)(1), and this Court’s Standing Order, for the Court to extend the upcoming pleading and discovery deadlines by 30 days to enable the parties additional time to explore a potential resolution of this action. The parties are participating in discussions in an attempt to resolve this matter without engaging in unnecessary litigation. Most recently, the parties have engaged in substantive settlement discussions and Burberry requires additional time to consider Plaintiff’s position, follow appropriate internal approval processes, and further engage Plaintiff in subsequent discussions about a potential resolution. Both parties thus stipulate as follows:

Burberry's time to answer or otherwise respond to Plaintiff's Complaint shall be extended by an additional 30 days from the current deadline of January 19, 2024 through and including February 19, 2024. To the extent Burberry files a dispositive motion in response to Plaintiff's Complaint, the parties agree to enter into a briefing schedule regarding same.

The deadline for the parties to participate in an initial conference pursuant to Federal Rule of Civil Procedure 26(f) shall be extended from January 22, 2024 through and including February 21, 2024.

The deadline for the parties to exchange initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) shall be extended from January 29, 2024 through and including February 28, 2024.

The deadline for the parties to submit a Joint Status Report shall be extended from February 5, 2024 through and including March 6, 2024.

Accordingly, both parties respectfully request that the Court find good cause to enter an order extending the upcoming pleading and discovery deadlines as set forth in this Stipulation and the proposed Order below.

IT IS SO STIPULATED by and between the parties.

DATED: January 22, 2024

EMERY REDDY, PLLC

LANE POWELL P.C.

/s/Timothy W. Emery

/s/Callie A. Castillo

Timothy W. Emery, WSBA No. 34078

Callie A. Castillo, WSBA No. 38214

Patrick B. Reddy, WSBA No. 34092

Dailey Koga, WSBA No. 58683

Paul Capriani, WSBA No. 59991

1420 Fifth Avenue, Suite 4200

600 Steward Street, Suite 1100

Seattle, WA 98101

Seattle, WA 98101

P: 206.223.7000

P: 206.442.9106

F: 206.223.7107

F: 206.441.9711

castilloc@lanepowell.com

emeryt@emeryreddy.com

kogad@lanepowell.com

redryp@emeryreddy.com

paul@emeryreddy.com

*Attorneys for Plaintiff Jacob Atkinson and
the Class*

/s/Ian Carleton Schaefer

Ian Carleton Schaefer, Esq.

Katerina Mantell, Esq.

SHEPPARD, MULLIN, RICHTER &
HAMPTON LLP

30 Rockefeller Plaza

New York, NY 10112

P: 212.653.8700

F: 212.653.8701

ischaefer@sheppardmullin.com

kmantell@sheppardmullin.com

Attorneys for Defendant Burberry Limited

ORDER

PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED.

Defendant's time to answer or otherwise respond to Plaintiff's Complaint shall be extended through and including February 19, 2024.

The deadline for the parties to participate in an initial conference pursuant to Federal Rule of Civil Procedure 26(f) shall be extended through and including February 21, 2024.

The deadline for the parties to exchange initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) shall be extended through and including February 28, 2024.

The deadline for the parties to submit a Joint Status Report shall be extended through and including March 6, 2024.

DATED this 25th day of January, 2024.



The Honorable Barbara J. Rothstein
United States District Judge